

4. From the date CMDA was authorized to proceed on behalf of Mr. Perry, the Petitioner and other CMDA attorneys have actively and diligently applied themselves to the investigation, preparation, and pursuit of Mr. Perry's claims, and have taken all steps necessary to prosecute those claims, including, but not limited to, correspondence and communication with Mr. and/or Mrs. Perry on 9/16/2016, 10/4/2016, 10/31/2016, 11/21/2016, 4/11/2017, 4/12/2017, 7/12/2017, 7/29/2017, 8/1/2017, and 8/10/2017, preparation and review of Mr. Perry's factual and legal circumstances, obtaining and reviewing medical records, and facilitating treatment by a neurologist and neuropsychologist on multiple occasions, including October 5, 2016, October 11, 2016, October 21, 2016, October 25, 2016, and November 21, 2016.

5. Mr. Perry has recently discharged the Petitioner and CMDA as his attorneys in this matter.

6. The Petitioner and CMDA were not terminated by Mr. Perry for cause, and the termination was not due to any malfeasance or other improper action on the part of Petitioner and/or CMDA.

7. The Petitioner claims the right to have a lien for attorney's fees and expenses established and enforced upon any sums to be derived from any settlement or judgment obtained or to be obtained by Mr. Perry in this action.

WHEREFORE, the Petitioner requests:

- a. That his attorney's lien be determined;
- b. That the amount of the lien be established;
- c. That the Court order that the Petitioner be entitled to enforce his attorney's lien against the proceeds to be derived from any settlement or judgment in this action;

d. That Defendant or the Defendant's insurer be prohibited from paying to Mr. Perry any sums of money until said lien has been satisfied;

e. For such other and further relief as this Court deems just.

Respectfully Submitted,

/s/ James R. Acho
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Livonia, MI 48152
(734) 261-2400
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Michigan Bar No. (P-62175)

Dated: September 24, 2018

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2018, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

/s/James R. Acho
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